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**FILED**  
JAN 27 2014  
HILARY W. WIEKING  
CLERK U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE

CR-13-00703-LH/L

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ADRIAN BALTAGA,  
GHEORGHE BALTAGA,

Defendants.

UNITED STATES' MOTION TO UNSEAL  
DOCUMENTS AND ~~PROPOSED~~ ORDER

UNDER SEAL

The government hereby moves this Court to unseal the items under the following  
dockets:

CR 12-90147 MISC – HRL

CR 12-90268 MISC – HRL

CR 12-90372 MISC – PSG

CR 12-90373 MISC – PSG

CR 12-90434 MISC – HRL

CR 12-90503 MISC – PSG

CR 12-90592 MISC – HRL

CR 12-90593 MISC – HRL  
CR 12-90676 MISC – NMC  
CR 12-90712 MISC – HRL  
CR 12-90809 MISC – PSG  
CR 12-90809-renewal – PSG  
CR 12-90832 MISC – HRL  
CR 12-90832 MISC – Extended -- PSG  
CR 12-90834 MISC – HRL  
CR 13-70237 – HRL  
CR 13-70238 – HRL  
CR 13-90108 MISC – PSG  
CR 13-90108 MISC-extension – NMC  
CR 13-90108 MISC-extension – HRL  
CR 13-90108 MISC-extension – HRL  
CR 13-90236 MISC – HRL  
CR 13-90284 MISC – PSG  
CR 13-90284 MISC-extension – HRL  
CR 13-90284 MISC-extension – HRL  
CR 13-90387 MISC – HRL  
CR 13-90677MISC – PSG  
CR 13-90681MISC –PSG  
CR 13-90736 MISC –PSG

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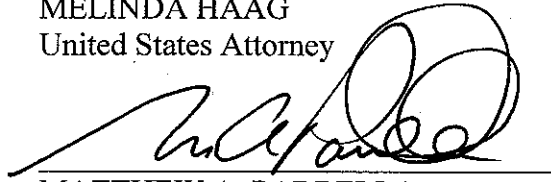
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1 The basis for this application is that the covert phase of this investigation is complete, the  
2 defendants have been indicted, and the government needs to complete discovery obligations under Rule  
3 16. In order to complete said obligations, the government needs to disclose the above-referenced items.  
4 The materials no longer need to remain sealed to the public.

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6 DATED: January 23, 2014 Respectfully submitted,

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8 MELINDA HAAG  
United States Attorney

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11 MATTHEW A. PARRELLA  
Assistant United States Attorney

**[PROPOSED] ORDER**

Based upon the motion of the government and for good cause shown, IT IS HEREBY ORDERED that the items under the following dockets, as well as this application and order, be UNSEALED:

CR 12-90147 MISC – HRL  
CR 12-90268 MISC – HRL  
CR 12-90372 MISC – PSG  
CR 12-90373 MISC – PSG  
CR 12-90434 MISC – HRL  
CR 12-90503 MISC – PSG  
CR 12-90592 MISC – HRL  
CR 12-90593 MISC – HRL  
CR 12-90676 MISC – NMC  
CR 12-90712 MISC – HRL  
CR 12-90809 MISC – PSG  
CR 12-90809-renewal – PSG  
CR 12-90832 MISC – HRL  
CR 12-90832 MISC – Extended -- PSG  
CR 12-90834 MISC – HRL  
CR 13-70237 – HRL  
CR 13-70238 – HRL  
CR 13-90108 MISC – PSG  
CR 13-90108 MISC-extension – NMC  
CR 13-90108 MISC-extension – HRL  
CR 13-90108 MISC-extension – HRL  
CR 13-90236 MISC – HRL  
CR 13-90284 MISC – PSG

1 CR 13-90284 MISC-extension – HRL

2 CR 13-90284 MISC-extension – HRL

3 CR 13-90387 MISC – HRL

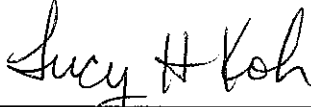
4 CR 13-90677MISC – PSG

5 CR 13-90681MISC –PSG

6 CR 13-90736 MISC –PSG

7  
8 IT IS SO ORDERED.

9  
10 DATED: 1/24/14

  
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LUCY H. KOH  
United States District Court Judge